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January 25, 2021

**VIA ECF**

Honorable John P. Cronan  
U.S. District Court Judge  
Southern District of New York  
500 Pearl Street, Room 1320  
New York, New York 10007

**Re: Johnson v. L'Oréal USA, Civil No. 18-cv-9786 (JPC)**

Dear Judge Cronan:

We represent Defendant L'Oréal USA ("L'Oréal") in the above referenced matter. In accordance with Your Honor's Individual Rules, we write on behalf of L'Oréal to request a brief extension of time for each date set forth in the summary judgment briefing schedule. Defendant proposes the following new deadlines:

- From February 1, 2021 to February 16, 2021: Deadline for Defendant to Move for Summary Judgment;
- From March 8, 2021 to March 23, 2021: Deadline for Plaintiff to Serve her Opposition to Defendant's Motion for Summary Judgment;
- From March 22, 2021 to April 6, 2021: Deadline for Defendant to Serve Reply Brief in Support of Its Motion for Summary Judgment.

An extension is necessary because some of the witnesses who Defendant is securing declarations from have been unavailable due to unexpected personal reasons. Plaintiff has consented to this extension of time with the understanding that Defendant will not withhold consent to any reasonable extension request by Plaintiff for her time to respond to Defendant's moving papers should she need it.

Additionally, pursuant to Your Honor's Individual Rules of Practice, Rule 2(B), Defendant respectfully requests five additional pages (from 25 to 30) for its memorandum of law in support of its motion for summary judgment. Defendant needs the additional five pages to adequately address the twelve causes of action that Plaintiff alleges. If Defendant's request is granted, Plaintiff respectfully requests from the Court similar permission to file an opposition memorandum of law of up to 30 pages in length.

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This is Defendant's first request for a modification of the briefing schedule and this schedule does not affect any other deadlines.

We thank the Court for its consideration of this request.

Respectfully submitted,

*/s/ Jean L. Schmidt*


Jean L. Schmidt

cc: Ms. Allison Van Kampen (via ECF)  
Mr. Gregory Chiarello (via ECF)

It is hereby ORDERED that Defendant shall have until February 16, 2021 to file its motion for summary judgment, Plaintiff shall have until March 23, 2021 to file her Opposition, and Defendant shall have until April 6, 2021 to file its Reply, if any. It is further ORDERED that Defendant's motion for summary judgment and Plaintiff's Opposition may each be 30 pages.

SO ORDERED.

Date: January 25, 2021  
New York, New York

  
JOHN P. CRONAN  
United States District Judge